## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

CITY OF NEWARK,

Plaintiff,

- against -

GEO RE-ENTRY GROUP, LLC; ABC CORPS. (A FICTIOUS COMPANY) 1-100,

Defendants.

No. 2:25-cv-02225-JKS-LDW

SUPPLEMENTAL RESPONSE TO COURT ORDER (ECF NO. 24) AND REQUEST FOR BRIEF EXTENSION

Defendant The GEO Group, Inc., incorrectly sued as GEO Re-Entry Group, LLC ("GEO"), respectfully provides this supplemental response to the Court's order docketed at ECF No. 24.

On April 21, 2025, GEO filed documents with the Court relating to the requested "issued permits or certificates relating to Delaney Hall since January 1, 2023." *See* ECF No. 28. GEO further represented that it was currently in the process of coordinating with ICE to complete the necessary redactions to the contract in order to provide it to the Court. The ICE contract is approximately 2,300 pages in length. In light of the length and the sensitive and confidential material, as described in GEO's previous filing, *see id.*, it typically takes several weeks to redact a document of this length. Under the contract terms, GEO needs ICE's explicit approval before it can release any language from that contract.

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GEO has been diligently working with ICE to prepare the contract for

submission since first ordered by this Court on April 17, 2025. Unfortunately, that

process is not yet completed.

Accordingly, GEO respectfully requests an additional brief extension to

provide the Court with a copy of the ICE Contract, which GEO hopes to be able to

provide no later than Thursday, April 24, 2025, in advance of the hearing currently

scheduled for April 25, 2025. GEO can provide the Court with daily updates on the

status, if so ordered.

**GEO** is ordered to file the

ICE Contract no later than

Thursday, April 24, 2025 at

12:00 p.m.

SO ORDERED.

/s/ Jamel K. Semper

HON. JAMEL K. SEMPER

**United States District Judge** 

**Dated: April 23, 2025**